

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Garris Smith,

Plaintiff,

vs.

Walmart Stores East, L.P.,

Defendant.

C/A: 2:24-cv-00818-RMG

**PLAINTIFF'S RULE 26 EXPERT
DISCLOSURE**

Plaintiff, Garris Smith, hereby submits his expert disclosure as required by Federal Rule of Civil Procedure 26(a) and the Court's Case Management and Scheduling Order. Plaintiff discloses the following expert witnesses who are reasonably expected to be called to offer opinions and testify at trial:

1. Bryan Durig, P.E.
Summit Engineering
P.O. Box 211426
Columbia, SC 29221

The above expert witness will offer opinions and testimony on all aspects of Plaintiff's fall. A complete statement of all opinions held by the above expert witness and the basis and reasons for such an opinion, the facts and data considered for each opinion, and any exhibits that will be used to support said opinions are contained in the expert's Rule 26 report. Report from this expert can be found with the contents.

2. Steven C. Poletti, M.D.
Southeastern Spine Institute
1106 Chuck Dawley Blvd.
Mount Pleasant, SC 29464

The above non-retained expert witness is reasonably expected to be called to offer opinions and testify at trial but is not expected or required to offer written reports of his opinion. Dr. Poletti will testify to his treatment of Plaintiff and opinion of the cause of injury related to the fall. Reports from this expert with the contents required by Fed R. Civ. P. 26(a)(2)(B) were provided to Defendants and their counsel on July 11, 2024.

3. Jeffrey Akhtar, M.D.
Tidewater Doctors
2270 Ashley Crossing Drive Ste. 155
Charleston, SC 29414

The above non-retained expert witness is reasonably expected to be called to offer opinions and testify at trial but is not expected or required to offer written reports of his opinion. Dr. Akhtar is Plaintiff's primary care provider and will testify to his treatment of Plaintiff and opinion of cause of injury related to the fall. All medical records of Dr. Akhtar have been provided through written discovery.

4. Darren Buono, M.D.
Star Teleradiology
PO Box 340426
Tampa, FL 33694

The above expert witness is reasonably expected to be called to offer opinions and testify at trial but is not expected or required to offer written reports of his opinion. Dr. Buono will testify to his opinions of Plaintiff's radiology images and reports and opinion of the cause of injury related to the fall.

5. Jeffrey Buncher, M.D.
Charleston Pain & rehabilitation
1124 Sam Rittenberg Blvd. Ste 1
Charleston, SC 29407

The above non-retained expert witness is reasonably expected to be called to offer opinions and testify at trial but is not expected or required to offer written reports of his opinion. Dr. Buncher is Plaintiff's Pain management provider and will testify to his treatment of Plaintiff and opinion of cause of injury related to the fall. All medical records of Dr. Buncher have been provided through written discovery.

6. Lindsay Moore, PA-C, CLCP
Moore Medical Consulting
1150 Hungryneck Blvd. Ste. C-378
Mt. Pleasant, SC 29464

The above expert witness will offer opinions and testimony as stated in her Rule 26 Report – Life Care Plan. A complete statement of all opinions held by the above expert witness and the basis and reasons for such opinion, the facts and data considered for each opinion, and any exhibits that will be used to support said opinions are contained in the expert's Rule 26 report.

7. All unobjectionable expert witnesses who are timely and properly disclosed by Defendants. At this time, Plaintiff does not know the opinions and testimony these proffered expert witnesses intend to offer. Plaintiffs therefore reserve the right to limit or exclude the testimony of any of Defendant's proffered expert witnesses.

Plaintiff reserves the right to amend or supplement these expert disclosures as permitted by Federal Rule of Civil Procedure 26(e) or by Court Order. Plaintiff additionally reserves the

right to amend or supplement this identification of non-retained expert witnesses and rebuttal witnesses as permitted by applicable Federal and/or Local Rules of Civil Procedure.

Dated: April 17, 2025

Respectfully Submitted,

/s/ Joseph S. Sandefur
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CERTIFICATE OF SERVICE

I, Diane Cipriani, an employee of Morgan & Morgan, do hereby certify that on this 17TH day of April, 2025, I emailed a copy of the ***Plaintiff's Rule 26 Expert Disclosure*** to counsel of record in said proceeding to their email address listed below. Service is perfected via email unless a hard copy was requested in writing by opposing counsel, and then one was mailed to the address below:

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Diane Cipriani, Litigation Paralegal
Morgan & Morgan